

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)	Criminal No. 19-36 (SRN/HB)
)	
v.)	DEFENDANT'S PRETRIAL MOTION
Plaintiff,)	TO SUPPRESS EVIDENCE BECAUSE
HURIAH KAREEM BLEDSOE,)	OF AN ILLEGAL SEARCH AND
)	SEIZURE
Defendant.)	

The defendant, by and through his attorney, respectfully moves the Court, pursuant to Rule 12 of the Federal Rules of Criminal Procedure to suppress any physical evidence obtained as a result of the various search warrants issued in this matter. After executing three search warrants on January 14, 2019, law enforcement seized cash from Mr. Bledsoe's person; firearms, ammunition, cash, and drugs from a hotel room; and a firearm holster from the trunk of a car. A fourth search was used to obtain DNA from Mr. Bledsoe on January 18, 2019. Each of the search warrant affidavits are somewhat similar in nature.

The affiant based the probable cause in each warrant on the following:

- An anonymous person's information about firearms in the hotel room, yet the affidavit contained no statements regarding said person's reliability in the past or in this particular investigation.
- Statements about firearms in the room is stale.
- Statements made by the housekeeper that she smelled marijuana in the room is stale.
- A K-9 gave a positive indication to the presence of illegal narcotic odors coming from the hotel room.

Based on this information, there was not probable cause in the warrants. The two warrants that Mr. Bledsoe is challenging is as follows:

1. On January 14, 2019, Liza K. Janzen, Minnesota District Court Judge, issued a search warrant authorizing the search of Room #228 of the Extended Stay Hotel in Brooklyn Center.

2. On January 14, 2019, Liza K. Janzen, Minnesota District Court Judge, issued a search warrant authorizing the search of a Grey Mercury Marquise, bearing Georgia License Plate RQK-XXXX.

Dated: July 30, 2019

Respectfully submitted,

s/ Manny K. Atwal

MANNY K. ATWAL

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